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13 *Attorney for Plaintiff, Deutsche Bank National Trust Company, as Trustee, in Trust for The*
14 *Registered Holders of Morgan Stanley ABS Capital I Inc. Trust 2006-HE7, Mortgage Pass-*
15 *Through Certificates, Series 2006 HE7*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 DEUTSCHE BANK NATIONAL TRUST
19 COMPANY, AS TRUSTEE, IN TRUST FOR
20 THE REGISTERED HOLDERS OF
21 MORGAN STANLEY ABS CAPITAL I INC.
22 TRUST 2006-HE7, MORTGAGE PASS-
23 THROUGH CERTIFICATES, SERIES 2006
24 HE7,

25 Plaintiff,

26 vs.

27 FIDELITY NATIONAL TITLE GROUP,
28 INC.; FIDELITY NATIONAL TITLE
INSURANCE COMPANY; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendant.

Case No.: 2:20-cv-01886-GMN-BNW

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
[ECF Nos. 57, 58]**

(Second Request)

COMES NOW, Plaintiff, Deutsche Bank National Trust Company, as Trustee, in Trust
for The Registered Holders of Morgan Stanley ABS Capital I Inc. Trust 2006-HE7, Mortgage
Pass-Through Certificates, Series 2006 HE7 (“Deutsche Bank”) and Defendants, Fidelity
National Title Group, Inc. and Fidelity National Title Insurance Company (“Defendants”), by and
through their respective undersigned counsels, stipulate and agree as follows:

1. On March 12, 2024, Defendants filed their Motion to Dismiss [ECF Nos. 57, 58]¹;
2. Deutsche Bank's deadline to respond to Defendants' Motion to Dismiss is currently April 9, 2024 following an initial extension granted by this Court [ECF No. 63];
3. Since the initial extension, on April 4, 2024, the Ninth Circuit Court of Appeals issued a memorandum decision in *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance Company*, Ninth Cir. Case No. 19-16181 (District Court Case No. 2:18-CV-00494-APG-BNW) ("*Wells Fargo*"). Deutsche Bank requires additional time to assess any potential impact of *Wells Fargo* on this matter;
4. Accordingly, good cause exists to grant a one-week extension up to and including April 16, 2024 for Deutsche Bank to file its response to Defendants' Motion to Dismiss;
5. Counsel for Defendants does not oppose the requested extension;
6. This is the second request for an extension and is made in good faith and not for purposes of undue delay or prejudice.

IT IS SO STIPULATED.

DATED this 9th day of April, 2024.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li, Esq.

Yanxiong Li, Esq.
Nevada Bar No. 12807
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
Attorneys for Plaintiff

DATED this 9th day of April, 2024.

SINCLAIR BRAUN KARGER LLP

/s/ Kevin S. Sinclair, Esq.

Kevin S. Sinclair, Esq.
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15260 Ventura Blvd., Ste 715
Sherman Oaks, California 91403
Attorneys for Defendants

IT IS SO ORDERED.

DATED: April 9, 2024


DISTRICT COURT JUDGE

¹ Defendants inadvertently filed this Motion to Dismiss a second time as ECF 58 and intends to file a stipulated request to strike this duplicative filing.